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Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

92-257

Ref: PR Docket No. ~~92-467~~
Comments

Gentlemen;

I have just received a copy of Docket 92-257. I initially feel that this will have a major effect on Marine Communications and that not enough time has been allowed for various organizations to comment on the proposed changes.

As an operator of several VHF Marine Public Coast Stations I will try and voice my opinions as to the effect of the proposed changes. I will proceed in the order as outlined in the inquiry.

The industry (VHF Coast Stations) has been shrinking in the past few years due to cellular and a dip in the economy. The commissions rules places an unfair burden on the operators of these stations that its competion does not have. Coast stations are subsidizing the the governments requirements for a safety system by being required to monitor 16 and also being required to answer and preempt any call and supply its operators when there is an emergency. Other services are not required to do this. Infact most cellular systems "CGSA" do not cover water but they promote and sell equipment for boats without having a live operator on duty or Channel 16 provisions.

This proposal sets a precedent to restrict growth of the marine industry. By reassigning frequencies it will eventualy prohibit the possibility of a seamless intergrated marine system.

At the present time there are thousands of handi-talkies being sold in the one to five watt capacity. Public Coast Stations need frequencies for remote receiver relays. We run into situations that small coves and inlets are not covered by our receiver due to the low power on the vessel and obstructions. We are limited by the low quality equipment being sold and installed on vessels today.

Additional Data only channels should be provided. This would allow dedicated transmission of important navigation data such as Differential GPS data and other weather data. These channels should be 2-way channels to enable packett type transmission with error checking provisions.

The marine communications industry has been very slow in persuing new and innovative equipment and solutions. Since the industry is market driven mostly by pleasure vessels, cost seems to be the governing factor. Much of the equipment sold to the public is of marginal construction and barely if at all meets specifications.

I see no reason that trunking can not be currently used with the already assigned channels. The limiting factor being vessel equipment. The current rules do not specifically address trunking. Does this make it illegal to use now? I think that current licensees of Public Coast Stations should be given the opportunity to create a advanced trunking system on possibly new frequencies within the current marine VHF band. It will take several years for the industry to provide equipment for this purpose. At the same time we must supply conventional services.

I have been very active in promoting Digital Selective Calling to the manufacturers in the marine industry. During 1991-1992 there was only one unit manufactured in the USA. It was manufactured by Ross Electronics. The equipment allows a vessel to make an interconnected call to the public switched network. Standard Communications announced (late 1992) a minimal unit (Class C ?) to send out an emergency call only. The full implementation of DSC will solve many of the current problems. It would allow unattended call placement via the public network, emergency traffic directed to the proper agency (Coast Guard), and eliminate aural watch in all cases. It would allow for trunking of frequencies since the protocol has it built in. It may not be as efficient as cellular trunking but I think it is more than adequate for the next ten years. Since vessels are not traveling between buildings and in most cases the entire call can be handled by the original station of contact. RM-801 of the Coast Guard requesting DSC signalling on future equipments is a step in the right direction but just dosen't go far enough. All sets should be required to be able to interface to the Public Network. The difference in manufacturing is 95% software. It is important to investigate why many coast stations are closing down. It is obvious that the operators don't think its a vible business anymore. We would install equipment to allow direct DSC calls. The amount of DSC equipped vessels do not justify it at this time. It is case of the chicken or egg.

The rules should contain provisions requiring DSC capability for all new radios manufactured after 1997, or sooner.

If the emergency system in the future is to rely on DSC it must be mandated for all radios and required on all new equipments being manufacturered.

With DSC signalling equipment a call can be picked up by a remote station and that station can dial up the Coast Guard automatically without the expense of leased lines. Remote leased lines are becoming a major expense in Public Coast Station operation. Stand alone intellegent stations can be installed at minimum expense.

The issue of the price of radios increasing in price with the addition of DSC is I think a moot point. If its done enmass the economy of scale will keep the cost down. How can we talk on one hand about introducing trunking, automatic interconnect, new technologies, etc. and then think that the $ 25.00 or so that the DSC modem will add to the cost would be excessive.

The Commission Rules should specify that DSC will be the only allowed selective calling system. The rules should allow three years for everyone to switch over to the newly established start date of DSC. In the interim DSC should still be an option.

Most all of the currently manufactured radios have the ability to transmit on all of the US and International frequencies. If the rules require interconnect to the Public Network via DSC for telephone calls, it will in effect be concerving spectrum. The boats will have the convenience of cellular and will utilize the marine channels.

We are against the idea of Private Carriers. This would cause the certain demise of the Public Coast Station as we know it. On one hand the commission is proposing a highly regulated set of stations (current Public Coast Stations) which are going to try and compete with non-regulated or non-tariffed stations.

We should allow Public Coast Stations to broaden its offerings. The data and fax transmission permission was a step in the right direction. Automatic interconnections with the PSTN should be granted as soon as possible. This will reduce the cost of operation and lower the per call cost to the user.

We now need additional frequencies for Mobile Relay. Frequencies so that we can intergrate a land station into the coast station network by establishing the land stations as control stations and letting them dispatch directly through the Public Ccast Station acting as a controlled (DSC) repeater. This would also allow a commercial vessel to talk directly to his office via the local Public Coast Station without having to set up a connections through the public network. This dispatch mode will increase spectrial efficiency. We also need frequencies for control and repeater operation. It is impossible to locate 72 Mhz frequencies in or around major metropolitan areas. The nature of an interconnected PSTN call requires clear repeater and control channels, 72 Mhz will not suffice.

An important issue that I don't think was brought up was the receiver portion of the VHF radio. We have experimented with several marine vhf radios. Using several different manufactures units we injected carriers on the split channel. We found that with strong signals and 5 Kc deviation that there is enough splatter to interfere with the adjacent channels.

Addressing the issue of reclassification of Public Coast Station as Non-Dominant Common Carriers. The trend now is for the large telephone companies to divest themselves of the "non-profitable" Public Coast Stations.

It is now an economic burden for us to change the user cost of a call, due to the high cost of filing new rates. The rules should be changed so that Non-Dominant Common Carriers be able to and amend their tarriffs by letter at a very nominal fee. (Less then $50.00) instead of the currently required $ 500.00.

The existing petiton regarding the private land mobile use of Marine frequencies should not be considered until the maritime interests are given a chance to develop new offerings, technologies, and maritime services. A large portion of the petition spends time on protection of existing carriers. If the commission wants to improve the maritime service it can not cause a situation that will create holes in a possible seamless network. It is well known that interference due to weather and temperature will cause skip sometimes up to 250 miles. Users of Public Coast Stations do not want interference on the channel since they are paying for a clear channel. The current rules provide for required coordination of the elimination of interference. ei: directive antennas, not answering a call directed to another station etc. I could see the inter-service sharing if and when the entire Marine system is operated without operators and is completely automatic. I agree with Mobile marine Radio when they state that the separation should

be at least 200 miles. If allowed they should not be allowed within 150 miles of the any coast line of the U.S.. This would guaranty that future Marine stations could be placed into operation without running into an "out of channel problem". I think that inter-sevice sharing has merit when all things are equal. Receiver design and operation being a big problem along with the mixing of wide and narrow band technologies. Is the proposed antenna height of 400ft. too high? Many existing marine stations are between 100 and 250 ft. above sea level. This excessive height of 400 ft. is sure to add to the interference problem. I believe that all applicants for marine frequencies should be treated equally. Contour maps (17db) along with investigation of all stations within 150 miles should be presented with each application. Proofs of non interference should be required. All applicants should be subject to public notice in the Marine Section of the public weekly listings so that Public Coast Stations will know who is filing.

I feel that this inquiry and notice to rule making if not handled in a way that will let the Ppublic Coast Stations enhance his services, and make a profit, will end the VHF Public Coast Station system. This will have a tremendous inpact on small businesses operating Public Coast Stations around the country, probably driving many of them bankrupt.

I think that the F.C.C. should conduct an open forum with the industry and discuss all of the issues. I was not aware of this proposal until just the other day. Has adaquate time been given to respond to these potential sweeping changes? I don't think so.

Respectfully submited by,

RAD-COM INCORPORATED

Murray Cohen,
President